

Exhibit A

Proposed Order

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
) (Jointly Administered)
CRED INC., <i>et al.</i> ,)
)
Debtors. ¹)
)
)

**ORDER GRANTING EMERGENCY MOTION OF THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR WITHDRAWAL OF THE
REFERENCE WITH RESPECT TO THE MOTION OF THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS FOR AN ORDER (I) HOLDING JAMES ALEXANDER
IN CONTEMPT OF COURT AND (II) ISSUING A BENCH WARRANT FOR
THE ARREST AND DETENTION OF JAMES ALEXANDER**

Upon the *Emergency Motion of the Official Committee of Unsecured Creditors for Withdrawal of the Reference With Respect to the Motion of the Official Committee of Unsecured Creditors for an Order (I) Holding James Alexander in Contempt of Court and (II) Issuing a Bench Warrant for the Arrest and Detention of James Alexander* (the “Withdrawal Motion”),² pursuant to 28 U.S.C. § 157(d) and Bankruptcy Rule 5011(a), for entry of an order by the United States District Court for the District of Delaware (the “Court”) withdrawing the reference of the *Motion of the Official Committee of Unsecured Creditors for an Order (I) Holding James Alexander in Contempt of Court and (II) Issuing a Bench Warrant for the Arrest and Detention of James Alexander* (the “Contempt Motion”); and this Court having jurisdiction to consider the Withdrawal Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number, as applicable, are as follows: Cred Inc. (8268), Cred (US) LLC (5799), Cred Capital, Inc. (4064), Cred Merchant Solutions LLC (3150), and Cred (Puerto Rico) LLC (3566). The Debtors’ mailing address is 3 East Third Avenue, Suite 200, San Mateo, California 94401.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Withdrawal Motion.

having reviewed the Withdrawal Motion; and this Court having held a hearing to consider the relief requested in the Withdrawal Motion; and this Court having determined that the legal and factual bases set forth in the Withdrawal Motion establish just cause for the relief requested therein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Withdrawal Motion is granted.
2. The Contempt Motion is hereby withdrawn pursuant to 28 U.S.C. § 157(d).
3. The Contempt Motion shall be set for hearing on _____, 2021 at []:[] [].m.
4. This Court shall retain jurisdiction to resolve any disputes arising from or related to this Order, and to interpret, implement and enforce the provisions of this Order.

Dated:

United States District Judge